

REMARKS

Claims 1-13 are canceled.

Claims 14-32 are pending

Claims 18-53 are added.

I. CLAIM OBJECTIONS

Claims 5 and 11 are objected to because of informalities. Claims 5 and 11 have been canceled without prejudice or disclaimer and thus the objections to these claims have been rendered moot.

II. REJECTION UNDER 35 U.S.C. § 102(e)

Claims 1-13 are rejected under *35 U.S.C. § 102(e)*. Claims 1-13 have been canceled without prejudice or disclaimer and thus the rejections of these claims have been rendered moot.

III. REJECTION UNDER 35 U.S.C. § 103(a)

The Examiner rejected Claims 14-17 under *35 U.S.C. § 103(a)* as being unpatentable over *Daswani et al.* (U.S. Pat. No. 6,477,565) (hereafter "*Daswani*") in view of *Nagatomo et al.* (U.S. Pat. No. 6,334,126) (hereafter "*Nagatomo*").

To establish a *prima facie* case of obviousness, the Examiner must meet three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be some reasonable expectation of success. Finally, the prior art reference must teach or suggest all the claim limitations.

Claim 14 recites a distributed data conversion processing system including a first system capable of receiving data conversion requests coupled to a network, the network being configured to be coupled to distributed devices and a database for storing capability vectors for a plurality of the distributed devices, wherein the first system utilizes at least one capability vector to identify at least one distributed device to accomplish data conversion. The Examiner states that *Daswani* discloses elements of the distributed data conversion processing system of Claim 14. The Examiner then states that *Daswani* fails to disclose a database for storing capability vectors for the plurality of distributed devices, wherein the first system utilizes at least one capability vector to identify at least one distributed device to accomplish data conversion. However, the Examiner states that "these features are well known in the art and would have been an obvious modification of the system disclosed by *Daswani* as evidenced by *Nagatomo*."

The Examiner states that analogous art, *Nagatomo*, discloses a system which receives a request for data and converts the data to an appropriate format and outputs the data to various apparatuses having a database for storing capability vectors for the plurality of distributed devices, wherein the first system utilizes at least one capability vector to identify at least one distributed device to accomplish data conversion citing *Nagatomo*, column 7, lines 9-13 and lines 20-25. *Nagatomo* states "actually, the requesting communication terminal 4, 5, or 6 reports, as its ability, information such as whether it has an image display function, a text display function, and voice reproducing function, and the capacity of data that can be stored." *Nagatomo*, column 7, lines 9-13. Requesting communication terminals 4, 5, and 6 are requesting devices and are analogous to requesting devices such as appliances 39-43 and 47 of *Daswani*. See *Daswani*, column 6, lines 56-63. The requesting communication terminals 4, 5, and 6 of *Nagatomo* informs the server how data needs to be formatted so that the terminal can display requested data. Then, when the requesting communication terminals 4, 5, and 6 request data from the server, the server access the data and converts the data into the format particular to the requesting terminal.

Requesting communication terminals 4, 5, and 6 do not convert data conversions, rather they are requesting devices that use converted data. Therefore, *Nagatomo* cannot be teaching the system of Claim 14 of the present invention. While *Nagatomo* stores the data display capabilities of requesting devices, *Nagatomo* does not teach the database for storing capability vectors for the plurality of distributed devices, wherein the first system utilizes at least one capability vector to identify at least one of the distributed devices to accomplish the data conversion of Claim 14. In *Nagatomo*, the server receives requests and does the data conversion and therefore does not identify (using any means) a distributed device to accomplish data conversion. See *Nagatomo*, column 6 lines 20-58. *Nagatomo* does not discuss distributed devices that accomplish data conversion. *Nagatomo* only teaches requesting communication terminals 4, 5, and 6, that request data from a server 2 through a network 3. The server 3 accesses information about what format the requesting communication terminals can use and then does the data conversion. The server then sends the converted data back to the requesting device. There are no distributed devices in *Nagatomo* that do data conversion; therefore, *Nagatomo* does not teach a database for storing capability vectors for the plurality of distributed devices, wherein the first system utilizes at least one capability vector to identify at least one of the distributed devices to accomplish the data conversion. No one of ordinary skill in the art would look to *Nagatomo* for teachings on a distributed data conversion processing system when *Nagatomo* teaches a centralized single server data conversion system where the data conversion is done in the server itself. The Examiner states that *Daswani* fails to disclose a database for storing capability vectors for the plurality of distributed devices, wherein the first system utilizes at least one capability vector to identify at least one distributed device to accomplish data conversion as recited in Claim 14 of the present invention. The Applicant has shown that *Nagatomo* does not teach the invention of Claim 14 nor is there any suggestion or motivation to modify the teachings of *Nagatomo* to arrive at the invention of Claim 14. Combining the teachings of *Nagatomo* with the teachings of *Daswani* does not result in a database for storing capability vectors for the plurality of

distributed devices, wherein the first system utilizes at least one capability vector to identify at least one distributed device to accomplish data conversion as recited in Claim 14 of the present invention. The Applicant respectfully asserts that *Daswani* and *Nagatomo*, singly or in combination, do not teach or suggest the invention of Claim 14. Therefore, the Applicant respectfully asserts that the rejection of Claim 14 under 35 U.S.C. § 103(a) as being unpatentable over *Daswani* in view of *Nagatomo* is traversed for the reasons stated above.

Claim 15 is dependent from Claim 14 and further limits the data conversion of Claim 14 to a language translation. Claim 15 has all the limitations of Claim 14. The Examiner states that *Daswani* discloses (sic) "wherein the data conversion comprises language translation" and cites column 9, lines 7-12. The Examiner has stated that *Daswani* does not disclose the invention of Claim 14 and therefore *Daswani* does not disclose the invention of Claim 15 wherein the data conversion is the particular data conversion comprising a language translation. The Examiner is silent as to the teachings of *Nagatomo* concerning the invention of Claim 14 wherein the data conversion comprises language translation. The Applicant respectfully asserts that *Daswani* and *Nagatomo*, singly or in combination, do not teach or suggest the invention of Claim 15. Therefore, the Applicant respectfully asserts that the rejection of Claim 15 under 35 U.S.C. § 103(a) as being unpatentable over *Daswani* in view of *Nagatomo* is traversed for the reasons stated above and for the reasons argued for Claim 14.

Claim 16 is dependent from Claim 14 and further limits the data conversion of Claim 14 to reformatting content of a network site. Claim 16 has all the limitations of Claim 14. The Examiner states that *Daswani* discloses (sic) "wherein the data conversion comprises reformatting content of a network site" and cites column 9, lines 7-12. *Daswani*, in column 9, lines 7-12, mentions nothing concerning data conversion comprising reformatting content of a network site. The Examiner has stated that *Daswani* does not disclose the invention of Claim 14 and therefore *Daswani* does not disclose the invention of Claim 15 wherein the data conversion is

the particular data conversion of reformatting content of a network site. The Examiner is silent as to the teachings of *Nagatomo* concerning the invention of Claim 14 wherein data conversion comprises reformatting content of a network site. The Applicant respectfully asserts that *Daswani* and *Nagatomo*, singly or in combination, do not teach or suggest the invention of Claim 16. Therefore, the Applicant respectfully asserts that the rejection of Claim 16 under 35 U.S.C. § 103(a) as being unpatentable over *Daswani* in view of *Nagatomo* is traversed for the reasons stated above and for the reasons argued for Claim 14.

Claim 17 is dependent from Claim 14 and further limits the first system as capable of receiving a request from a wireless device server, the wireless device server having first received a request for the content from the network site from a wireless device. Claim 17 has all the limitations of Claim 14. The Examiner states that *Daswani* discloses (sic) "wherein the first system is capable of receiving a request from a wireless device server, the wireless device server having first received a request for the content from the network site from a wireless device" and cites column 7, lines 32-33. *Daswani*, in column 7, lines 32-33, states (sic) "data center 37 processes requests from network 13 and forwards them to main server 33 where they are implemented." *Daswani* mentions nothing concerning a request from a wireless device server, the wireless device server having first received a request for the content from the network site from a wireless device. The Examiner has stated that *Daswani* does not disclose the invention of Claim 14 and therefore *Daswani* does not disclose the invention of Claim 17 wherein the first system as capable of receiving a request from a wireless device server, the wireless device server having first received a request for the content from the network site from a wireless device. The Examiner is silent as to the teachings of *Nagatomo* concerning the invention of Claim 17 wherein the first system as capable of receiving a request from a wireless device server, the wireless device server having first received a request for the content from the network site from a wireless device. The Applicant respectfully asserts that *Daswani* and *Nagatomo*, singly or in combination, do not teach or suggest the invention of Claim

17. Therefore, the Applicant respectfully asserts that the rejection of Claim 17 under 35 U.S.C. § 103(a) as being unpatentable over *Daswani* in view of *Nagatomo* is traversed for the reasons stated above and for the reasons argued for Claim 14.

IV. CONCLUSION

Claims 1-13 have been canceled without prejudice or disclaimer.

Claims 18-32 have been added.

The rejections of Claims 14-17 under 35 U.S.C. § 103(a) as being unpatentable over *Daswani* in view of *Nagatomo* are traversed.

The Applicant, therefore, respectfully asserts that Claims 14-17 and added Claims 18-53 are now in condition for allowance and request an early allowance of these claims.

Applicant respectfully request that the Examiner call Applicant's attorney at the below listed number if the Examiner believes that such a discussion would be helpful in resolving any remaining problems.

Respectfully submitted,

WINSTEAD SECHREST & MINICK P.C.

Patent Agent and Attorney for Applicants

By:

Richard F. Frankeny
Reg. No. 47,573
Kelly K. Kordzik
Reg. No. 36,571

P.O. Box 50784
1201 Main Street
Dallas, Texas 75250-0784
(512) 370-2872